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January 9, 2013

VIA CM/ECF

Honorable Richard D. Bennett
UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
101 West Lombard Street, Chambers 5D
Garmatz Federal Courthouse
Baltimore, Maryland 21201

Re: *In re Titanium Dioxide Antitrust Litigation*
Master Dkt. No. 10-CV-318 (RDB)

Dear Judge Bennett:

Plaintiffs submit this letter in connection with the telephonic case management conference in the above-referenced matter set for Tuesday, January 15, 2013, at 5:00 p.m.

On December 21, 2012, Defendants disclosed four experts whose reports total approximately 400 pages and are accompanied by thousands of pages of supporting materials. In order for Plaintiffs' experts to have sufficient time to prepare their rebuttal reports¹, Plaintiffs request the Court's approval of the following revised schedule to which Defendants have agreed. The proposed schedule revisions do not change any other dates including the motions hearing date and trial date. The proposed revised schedule is as follows:

Event	Date
Plaintiffs' Rebuttal Rule 26(a)(2) Expert Disclosures	Monday, February 18, 2013 [Existing date: January 29, 2013]
Depositions of Plaintiffs' Experts on Rebuttal Reports	Thursday, March 14, 2013 [Existing date: 30 days after disclosure]

¹ Plaintiffs intend to submit rebuttal expert reports from Plaintiffs' previously disclosed experts Dr. Lamb and Dr. Hamilton, and potentially a third rebuttal report from a new rebuttal expert. Defendants reserve all rights to object to Plaintiffs' rebuttal experts.



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Event	Date
Expert Discovery Deadline	Thursday, March 14, 2013 [Existing date: March 1, 2013]
Last Day to File Dispositive Pretrial Motions	Monday, March 18, 2013 [Existing date: March 1, 2013]
Responses to Dispositive Motions due	Tuesday, April 23, 2013 [Existing date: April 22, 2013]
Reply to Responses to Dispositive Motions due	Tuesday, June 4, 2013 [Existing date: May 31, 2013]
Hearing on Motions	June 25, 2012 [Unchanged]
Pre-Trial Conference	Monday, August 26, 2013 at 4:30 pm [Unchanged]
Trial	Monday, September 9, 2013 through Friday, October 4, 2013 [Unchanged]

The parties have also discussed the issue of possible page limitations for summary judgment briefing, so that the Court and counsel will not be burdened by duplicative filings. Based on those discussions, counsel for Plaintiffs and Defendants may have some proposals to present during the January 15 conference call.

We look forward to addressing these matters with the Court and counsel on January 15.

Respectfully,

/s/ Robert B. Levin

RBL/kmm

cc: All counsel of record (via CM/ECF)